

MOED-0001

DISCLOSURE STATEMENT

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI

Twain GL XXV, LLC

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Plaintiff(s),

)

)

vs.

) Case No. 4:23-cv-00695-MTS

Jeffrey Ahlholm

)

Lawrence Feigen

)

SA Hospital Acquisition Group LLC

)

Defendant(s).

)

**DISCLOSURE STATEMENT**

Pursuant to Local Rule 2.09 and Federal Rule of Civil Procedure 7.1, Counsel of record for  
Twain GL, XXV LLC hereby discloses the following:

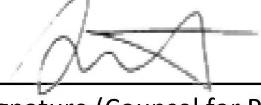
1. If the subject is a nongovernmental corporate party or a nongovernmental corporation that seeks to intervene,
  - a. Whether it is publicly traded, and if it is, on which exchange(s):  
No
  - b. Its parent companies or corporations (if none, state "none"):  
None
  - c. Its subsidiaries not wholly owned by the subject (if none, state "none"):  
None
  - d. Any publicly held company or corporation that owns five percent (5%) or more of the subject's stock (if none, state "none"):  
None
2. If the subject is a party or intervenor in an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), the name and citizenship of every individual or entity whose citizenship is attributed to that party or intervenor, including all members, sub-members, general and limited partners, and corporations:  
See attached Exhibit 1

Note: Sub-members include the members of members (i.e., first-tier sub-members), and the members of first-tier sub-members (i.e., second-tier sub-members), the members of second-tier sub-members (i.e., third-tier sub-members), and so on, until the Court knows the citizenship of *all* persons and entities within the ownership structure. Further, if a corporation is a member or sub-member of the subject organization, that corporation's state of incorporation and principal place of business must be disclosed.

MOED-0001

DISCLOSURE STATEMENT

By signing this form, counsel acknowledges that "if any required information changes," and/or "if any later event occurs that could affect the court's jurisdiction under 28 U.S.C. § 1332(a)," counsel will file a Disclosure Statement promptly, and no later than seven (7) days of the change or event. EDMO L.R. 2.09(C); *see also* Fed. R. Civ. P. 7.1(a)(2)(B) and 7.1(b)(2).



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Signature (Counsel for Plaintiff/Defendant)  
Print Name: Andrew Scavotto  
Address: 7700 Forsyth Blvd, Suite 1100  
City/State/Zip: St. Louis, MO 63105  
Phone: (314) 719-3048

Certificate of Service

I hereby certify that a true copy of the foregoing Disclosure Statement was served (by mail, by hand delivery, or by electronic notice) on all parties on:

TBD-process server, 20 23.



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Signature

# **EXHIBIT 1**

**Case No. 4:23-cv-00695-MTS | Twain GL XXV, LLC Disclosure Statement**

**Exhibit 1**

1. Plaintiff Twain GL XXV, LLC ("Twain") is a Missouri limited liability company with its principal place of business located in this judicial district at 2200 Washington Avenue, St. Louis, Missouri, 63103.

2. Twain GL XXV, LLC's sole member is Twain Funding II LLC (a Delaware LLC).

3. Twain Funding II LLC's sole member is Twain Financial Partners Holding LLC (a Missouri LLC).

4. Twain Financial Partners Holding LLC's sole member is Twain Topco LLC (a Missouri LLC).

5. Twain Topco LLC's members are:

- (a) The Karen Handelman 2021 Family Trust;
- (b) The Mary Badler 2021 Family Trust;
- (c) The Hirshman Family Trust;
- (d) The Badler Family Trust;
- (e) 2 M Management LLC;
- (f) Matthew Guymon, TOD Guymon Revocable Trust (the "Guymon Trust"); and
- (g) The Taylor Family Joint Revocable Trust

5. 2 M Management LLC's members are:

- (a) The Marc Hirshman Trust; and
- (b) The Matthew Badler Revocable Trust.

6. The Karen Handelman 2021 Family Trust is governed by Missouri law, which imposes fiduciary duties on the trustee and authorizes the trustee to sue and be sued on behalf of the trust. The trustees of the Karen Handelman Family Trust are Karen Handelman and Marc

Hirshman.

7. The Mary Badler 2021 Family Trust is governed by Missouri law, which imposes fiduciary duties on the trustee and authorizes the trustee to sue and be sued on behalf of the trust. The trustees of the Mary Badler 2021 Family Trust are Mary Badler and Matthew Badler.

8. The Hirshman Family Trust is governed by Missouri law, which imposes fiduciary duties on the trustee and authorizes the trustee to sue and be sued on behalf of the trust. The trustee of the Hirshman Family Trust is Marc Hirshman.

9. The Badler Family Trust is governed by Missouri law, which imposes fiduciary duties on the trustee and authorizes the trustee to sue and be sued on behalf of the trust. The trustee of the Badler Family Trust is Matthew Badler.

10. The Guymon Trust is governed by Missouri law, which imposes fiduciary duties on the trustee and authorizes the trustee to sue and be sued on behalf of the trust. The trustee of the Guymon Trust is Matthew Guymon.

11. The Taylor Family Joint Revocable Trust is governed by Missouri law, which imposes fiduciary duties on the trustee and authorizes the trustee to sue and be sued on behalf of the trust. The trustee of the Taylor Family Joint Revocable Trust is David Taylor.

12. The Marc Hirshman Trust is governed by Missouri law, which imposes fiduciary duties on the trustee and authorizes the trustee to sue and be sued on behalf of the trust. The trustee of the Marc Hirshman Trust is Marc Hirshman.

13. The Matthew Badler Revocable Trust is governed by Missouri law, which imposes fiduciary duties on the trustee and authorizes the trustee to sue and be sued on behalf of the trust. The trustee of the Matthew Badler Revocable Trust is Matthew Badler.

14. At the time this action was commenced and as of the date of this Amended

Complaint, Matthew Badler and Mary Badler reside permanently in St. Louis County, Missouri, and are taxpayers and citizens of the State of Missouri.

15. At the time this action was commenced and as of the date of this Amended Complaint, Marc Hirshman and Karen Handelman reside permanently in Colorado, and are taxpayers and citizens of the State of Colorado.

16. At the time this action was commenced and as of the date of this Amended Complaint, Matthew Guymon resides permanently in St. Louis County, Missouri, and is a taxpayer and citizen of the State of Missouri.

17. At the time this action was commenced and as of the date of this Amended Complaint, David Taylor resides permanently in St. Louis County, Missouri, and is a taxpayer and citizen of the State or Missouri.